per the LEC Price Cap Order.[24] Precedent for this type of cost treatment has been set by the Commission in the 800 Service Order.[25] The Commission should also carefully consider the impact on the states under separations of any costs they impose in mandating a number portability solution.

[24] *Policy and Rules Concerning Rates for Dominant Carriers* (Price Caps), CC Docket No. 87-313, Second Report and Order, 5 FCC Rcd. 6786, 6807 (1990).

[25] *Provision of Access for 800 Service,* CC Docket No. 86-10, Second Report and Order (800 Access), 8 FCC Rcd. 911 (1993).

IV. CONCLUSION

NYNEX has worked within the industry and will continue to do so to help define the various types of number portability, the need for various capabilities, the options for a solution and the issues these various implementations create. However, NYNEX believes it is premature to determine the appropriate solutions at this time. NYNEX recommends the Commission implement a two-step approach to number portability concentrating first on service provider portability by adopting NYNEX's proposed principles and guidelines; allowing the trials to proceed and using that data for cost benefit analyses; and endorsing the interim solutions that the industry is currently using. Once a service provider portability solution is at hand, NYNEX believes work should commence to evolve that solution to develop solutions for location portability.

Respectfully submitted,

New England Telephone and
Telegraph Company

New York Telephone Company

By: _____
Maureen F. Thompson

1095 Avenue of the Americas
New York, NY 10036
212-395-6166

Their Attorney

Dated: September 12, 1995

Number Portability Solutions
Compared To
The Technologies Which Support Them

	Interim Number Portability (INP)	Carrier Portability Code (CPC)[B]	Local Area Number Portability (LANP)	Location Routing Number (LRN)[D]
Switched Based	Yes	No	No[C]	No
Existing IN	Yes[A]	No	No	No
Enhanced IN	Yes[A]	Yes	No[C]	No
Existing AIN	Yes[A]	No	No	No
Enhanced AIN	Yes[A]	Yes	Yes	Yes

[A] = The INP solutions are switched based in nature. Although they will work with the introduction of IN or AIN technologies, these technologies are not expected to provide additional benefit.

[B] = MCI, the main proponent of the CPC solution, has reported that the CPC solution has been made to work in a laboratory setting with a single Siemens switch. To NYNEX's knowledge, no field trial of this solution has been attempted. However, NYNEX, along with most other LECs, do not use Siemens switches.

[C] = The LANP scheme does not include this technology as a part of its solution. US Intelco, the main proponent of this plan, has proposed "work arounds" to resolve these shortcomings. NYNEX does not consider number portability schemes requiring "work arounds" to be complete solutions.

[D] = This solution, also called the Network Routing Address (NRA), as proposed requires standards work to be implemented.

Number Portability Solutions
Compared To
The Types of Number Portability They Will Support

	Interim Number Portability (INP)	Carrier Portability Code (CPC)	Local Area Number Portability (LANP)	Location Routing Number (LRN)
Service Provider	Yes	Yes[B]	Yes	Yes
Location	Yes	No	Yes	Yes
Service[A]	Yes	No	Yes	Yes

[A] = Feature interaction problems have not been evaluated with this scenario.

[B] = Because the CPC solution identifies a network rather than an individual switch, it creates difficulties in porting a number to a provider with more than one switch in their network. Utilizing the CPC solution, carriers with more than one switch in their network will have difficulty routing calls for ported numbers residing on their network. At a minimum, the CPC solution will place additional burdens on the network, requiring a "work around" that would require tandems to perform ten digit translations. This activity is currently not performed in the NYNEX network and could adversely impact network performance. NYNEX does not consider number portability schemes requiring "work arounds" to be complete solutions. However, despite these inadequacies, NYNEX will be attempting to utilize this solution in the trial tentatively slated to begin in Manhattan, New York in February 1996.

Number Portability Solutions Compared To The Services They Will Support

	Interim Number Portability (INP)	Carrier Portability Code (CPC)	Local Area Number Portability (LANP)	Location Routing Number (LRN)
Automatic Callback -				
Activation To:				
- Ported Customer	No	No	No	No
- Non Ported Customer in a Portable NXX	Yes	No*	No*	Yes
Automatic Recall -				
Activation To:				
- Ported Customer	Yes	No	Yes	No
- Non Ported Customer in a Portable NXX	Yes	No*	No*	Yes
Call Trace From Ported Customer	No	Yes	No**	Yes
Caller ID From Ported Customer	No	Yes	No**	Yes
Coin Phone -				
Call To:				
- Ported Customer	Yes	No	No	No
- Non Ported Customer in a Portable NXX	Yes	No	No	Yes
ISDN Circuit Switched Data Capability -				
Call To:				
- Ported Customer	Yes	No	No	No
- Non Ported Customer in a Portable NXX	Yes	No	No	Yes
LIDB Services for Ported Customer	No	No	No	No

* = These capabilities will not work for intra switch calls when an AIN solution is implemented because of adverse feature interactions between AIN and the capability in question.

**= The LANP scheme does not include this capability as a part of its solution. US Intelco, the main proponent of this plan, has proposed "work arounds" to resolve these shortcomings. NYNEX does not consider number portability schemes requiring "work arounds" to be complete solutions.